

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

JOHN W. MCDONALD,

Plaintiff,

v.

SOUTHWEST RECOVERY  
SERVICES, INC.,

Defendant.

Case No. 3:19-cv-02271-C

Honorable Sam R. Cummings

**SECOND UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE DISMISSAL  
DOCUMENTS**

JOHN W. MCDONALD (“Plaintiff”), by and through his attorneys, Sulaiman Law Group, Ltd. . moves this Court to extend the deadline to file dismissal documents, and in support thereof, state as follows:

1. On November 13, 2019, Plaintiff and SOUTHWEST RECOVERY SERVICES, INC. (“Defendant”) reached settlement and filed a Notice of Settlement with this Honorable Court [Dkt. No. 13].
2. On November 14, 2019, this Court, pursuant to the filing of the notice of settlement ordered both parties to file their dismissal documents by January 13, 2020. [Dkt. No. 14].
3. On January 17, 2020, Plaintiff filed an Unopposed Motion to Extend Deadline to File Dismissal Documents. [Dkt. No. 16].
4. On January 21, 2020, this Honorable Court extended the parties deadline to file their dismissal documents to and including, February 17, 2020.
5. Defendant, however, remains in the process of meeting the conditions set forth in the settlement agreement and requires an additional 30 days to complete this process.

WHEREFORE, Plaintiff respectfully requests the Court extend the deadline to file dismissal documents to March 18, 2020, and grant any other relief deemed appropriate and equitable.

Dated: February 17, 2020

Respectfully submitted,

/s/ Nathan C. Volheim

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**CERTIFICATE OF CONFERENCE**

On the 17<sup>th</sup> day of February the undersigned contacted Defendant's counsel, Marissa L. Boulanger via email to confer about the foregoing Second Motion to Extend Deadline to File Dismissal Documents and she has advised that Defendant is unopposed to the filing of this motion.

**CERTIFICATE OF SERVICE**

I, Nathan C. Volheim, an attorney, hereby certify that on February 17, 2020, the foregoing **PLAINTIFF'S SECOND UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE DISMISSAL DOCUMENTS** was filed with the Clerk of the Court of the United States District Court for the Northern District of Texas by using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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/s/ Nathan C. Volheim

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